

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

MILSTEAD & ASSOCIATES, LLC

By: Andrew M. Lubin

Atty. ID: AL0814

1 E. Stow Road

Marlton, NJ 08053

(856) 482-1400

File No.: 223758-7

Attorneys for Secured Creditor: Wells Fargo
Bank, National Association, as Trustee for the
SACO I Inc. Mortgage Pass-Through
Certificates Series 1999-3

In Re:

William Hugh Clements, Jr. aka William Hugh
Clements and Teresa Jean Clements

Case No.: 16-10240-JNP
Chapter 13

Hearing Date: December 1, 2020
Time: 11:00 a.m.

Judge: Jerrold N. Poslusny, Jr.

**CERTIFICATION IN RESPONSE TO DEBTORS' OBJECTION TO NOTICE OF
MORTGAGE PAYMENT CHANGE**

I, Andrew M. Lubin, being of full age and duly sworn, hereby certify as follows:

1. I am the attorney for the secured creditor, Wells Fargo Bank, National Association, as Trustee for the SACO I Inc. Mortgage Pass-Through Certificates Series 1999-3 (hereinafter "Secured Creditor"), and make this Certification in response to Debtors' Objection to Notice of Mortgage Payment Change.
2. On October 1, 2020, Secured Creditor filed a Notice of Mortgage Payment Change in the above captioned matter. (Claims register, Claim #11)
3. The Annual Escrow Account Disclosure Statement filed with the Notice advised Debtors that they had a total escrow shortage of \$513.47, and that unless the Debtors elected to pay the shortage in full, it would be collected over 12 months at \$42.79 per

payment through the monthly escrow payment.

4. The Debtors forwarded the amount of \$513.47 to pay the shortage in full, which amount has been received by the Secured Creditor.
5. Based on Debtors' payment of the escrow shortage, the Debtors' escrow account is in the process of being re-analyzed by the Secured Creditor, in order to amend the Notice filed on October 1, 2020.
6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 23, 2020

/s/ Andrew M. Lubin
ANDREW M. LUBIN

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

MILSTEAD & ASSOCIATES, LLC

By: Andrew M. Lubin Atty. ID: AL0814

1 E. Stow Road

Marlton, NJ 08053

(856) 482-1400

File No. 223758-6

Attorneys for Secured Creditor: Wells Fargo Bank,
National Association, as Trustee for the SACO I
Inc. Mortgage Pass-Through Certificates Series
1999-3

In Re:

William Hugh Clements, Jr. aka William Hugh
Clements and Teresa Jean Clements

Case No.: 16-10240-JNP
Chapter 13

Judge: Jerrold N. Poslusny, Jr.

CERTIFICATION OF SERVICE

1. I, Andrew M. Lubin, Esquire:

☒ represent the Secured Creditor in the above-captioned matter.

☐ am the secretary/paralegal for _____, who represents the
_____ in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On November 23, 2020, I sent a copy of the following pleadings and/or documents to the parties
listed in the chart below:

Certification in Response to Debtors' Objection to Notice of Mortgage Payment Change

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of
service indicated.

DATED: November 23, 2020

/s/ Andrew M. Lubin

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Francis Landgrebe Law Office of Francis Landgrebe 71 Cooper St. Woodbury, NJ 08096	Debtors' Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
William Hugh Clements, Jr. aka William Hugh Clements 609 Muhlenberg Avenue Wenonah, NJ 08090-1430	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Teresa Jean Clements 609 Muhlenberg Avenue Wenonah, NJ 08090-1430	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.